

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

In the Matter of:
Argyle Post Office
Argyle, Florida

Docket No. A2011-89

UNITED STATES POSTAL SERVICE
COMMENTS REGARDING APPEAL
(November 17, 2011)

On September 20, 2011, the Postal Regulatory Commission (Commission) received an appeal (the Petition) postmarked September 11, 2011, from a group of postal customers who are citizens of Argyle, Florida (collectively, the Petitioners), objecting to the discontinuance of the Post Office at Argyle, Florida. On September 28, 2011, the Commission issued Order No. 881, its Notice and Order Accepting Appeal and Establishing Procedural Schedule under 39 U.S.C. § 404(d). The Commission received no additional written communications from customers of the Argyle Post Office. The Petitioners did not file a Form 61 or initial brief in support of the petition. In accordance with Order No. 881, the administrative record was filed with the Commission on October 7, 2011.

The Petition raises two main issues: (1) the Petitioners question the adequacy of the alternatives through which the Argyle community will continue to receive postal services; and (2) they question the accuracy of the Final Determination. As reflected in the administrative record of this proceeding, the Postal Service gave serious consideration to the adequacy of the alternatives through which the Argyle community will continue to receive postal services. Further, the Final Determination is accurate.

In addition, consistent with the Postal Service's statutory obligations and Commission precedent,¹ the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Argyle Post Office should be affirmed.

Background

The Final Determination to Close the Argyle, FL Post Office and Extend Service by Rural Route Service (FD), as well as the administrative record, indicate that the Argyle Post Office provides EAS-11 level service to 98 Post Office Box and general delivery customers; retail service is available 32.5 hours per week. FD at 2. The postmaster of the Argyle Post Office retired on November 21, 2009, leaving a vacancy. A noncareer employee was installed as the temporary officer-in-charge (OIC).

The average number of daily retail window transactions at the Argyle Post Office is forty, which accounts for an average daily retail workload of forty-eight minutes. Revenue has generally been low: \$28,153 in FY 2008; \$27,744 in FY 2009; and \$26,762 in FY 2010. FD at 2. The Argyle Post Office has no meter or permit customers. FD at 2.

Upon implementation of the final determination, the noncareer OIC will be reassigned to another location or separated from the Postal Service, and delivery and retail services will be provided by the Defuniak Springs Post Office, an EAS-20 level office located four miles away, and by rural route service administered through the Defuniak Springs Post Office. FD at 2, 5.

¹ See 39 U.S.C. 404(d)(2)(A).

The Postal Service followed the proper procedures which led to the posting of the FD. All issues raised by the customers of the Argyle Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and FD, customers received notice through other means. Questionnaires were distributed to delivery customers of the Argyle Post Office; questionnaires were also available over the counter for retail customers at the Argyle Post Office. FD at 2. The returned customer questionnaires and Postal Service response letters appear in the administrative record in Item No. 22. In addition, representatives from the Postal Service were available at Defuniak Springs Civic Center for a community meeting on March 8, 2011. FD at 2. Customers received formal notice of the proposal and final determination through postings at nearby facilities. The Proposal was posted with an invitation for public comment at the Argyle Post Office and the Defuniak Springs Post Office from April 16, 2011 to June 17, 2011. FD at 1. The FD was posted at the same two Post Offices from August 29, 2011 to September 30, 2011, as confirmed by the round-dated FD cover sheet that appears in the administrative record.

In light of the postmaster vacancy, a minimal workload, low office revenue, the nearness of another post office, and the availability of rural delivery and retail service, the Postal Service issued the FD. Regular and effective postal services will continue to be provided to the Argyle community in a cost-effective manner upon implementation of the final determination. FD at 2, 9.

Each of the issues raised by the Petitioners is addressed in the paragraphs that follow.

Adequacy of Alternatives

The Petitioners question whether the alternative means through which the Argyle community will continue to receive postal services will be sufficient. For example, they state that it would be a hardship on some customers to install and maintain mailboxes. Petition at 2. They state that, for some handicapped customers, it would be difficult to cross the street to reach their mailboxes. Petition at 1. They also state that there is no public transportation to take customers to the Defuniak Springs Post Office. Petition at 2. The Petitioners believe there could be inconveniences in purchasing money orders and stamps, and in sending and receiving accountable mail. Petition at 1. The Petitioners also believe that rural delivery service could entail security threats, such as identity theft. Petition at 1.

The Postal Service has considered the impact of closing the Argyle Post Office upon the provision of postal services to Argyle customers. Some customers will be able to travel to the Defuniak Springs Post Office to access postal services. For customers who are not able to travel to the Defuniak Springs Post Office, postal services can be provided by a carrier. Most transactions do not require meeting the carrier at the mailbox; for example, Stamps by Mail and Money Order Application forms are available. The carrier will be able to accept any letters or packages for mailing; the carrier will estimate the cost and provide a receipt for any money received, and on the following delivery day, the carrier will provide change or a bill for the amount over the estimate.

The carrier will make delivery to a roadside mailbox close to customers' residences, and, in hardship cases, the carrier can make delivery to the home of a customer. For customers without a hardship, carrier delivery necessarily involves the installation and maintenance of a mailbox. Customers across the country -- across rural, urban, and suburban settings -- are able to install and maintain mailboxes for carrier delivery. In regard to security concerns, the Postal Inspection Service has not received reports of mail theft or vandalism in the Argyle area, and as stated in the Final Determination, customers may use locked mailboxes. Item 25; FD at 4.

Accuracy of Final Determination

In addition to questioning the sufficiency of the means through which the Argyle community will continue to receive postal services, the Petitioners question the accuracy of the Final Determination. They state that "the annual lease costs listed in Paragraph IV at \$4800 is also incorrect," and that they "believe that the correct amount is \$3300 per year." Petition at 2. The Postal Service's records show that the annual lease costs are \$4800. The Petitioners have not furnished any evidence showing that that figure is incorrect. In any case, assuming the correct amount were \$3300, the total annual savings listed on page 8 of the Final Determination would be reduced from \$47,729 to \$46,229. Taking into account all of the factors that the Postal Service considered in determining to discontinue the Argyle Post Office, this difference of \$1500 would not alter the determination.

Conclusion

As reflected throughout the administrative record, the Postal Service has followed the proper procedures and carefully considered the effect of closing the Argyle Post Office on the provision of postal services and on the Argyle community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d)(2)(A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that, after the discontinuance, the Postal Service will continue to provide effective and regular service to Argyle customers. FD at 9. The Postal Service respectfully submits that this conclusion is consistent with and supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Argyle Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Argyle Post Office be affirmed.

Respectfully submitted,

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